

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TABATHA FOSTER,

Plaintiff,

v.

THE CITY OF NEW YORK, THE CITY OF
NEW YORK, RAYMOND W. KELLY,
as Former Police Commissioner,
Police Department City of New York,
WILLIAM J. BRATTON, as Former Police
Commissioner, Police Department City of New York,
JAMES P. O'NEILL, as Police Commissioner,
Police Department City of New York
and JEFFREY B. MADDREY, as Assistant Chief,
Patrol Borough Brooklyn North, Police
Department City of New York sued individually
and in their official capacities as employees of
defendant THE CITY OF NEW YORK.

Defendants.
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Civil Action No.16-CV-6859.

DEFENDANT'S NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant's Motion for Summary Judgment; together with the Declaration of Lambros Y. Lambrou, Esq. together with all attached Exhibits (A-I); and upon all the pleadings and proceedings herein, Defendant, Jeffrey B. Maddrey, by and through its undersigned counsel, The Lambrou Law Firm P.C., will move this Court before the Honorable Ann Donnelley, United States District Judge, for an order: (i) granting Defendant's Motion to for Summary Judgment in its entirety pursuant to Rule 56(b) of the Federal Rules of Civil Procedure; and (ii) granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that the Defendant respectfully requests oral argument on its Motion, only in the event that Plaintiff makes such a request.

Dated: New York, New York
November 27, 2018

Respectfully submitted,
THE LAMBROU LAW FIRM PC

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